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**From:** Burdett, Cheryl [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E8F84378969242DBA5EB260C1CC89FB8-CBURDETT]  
**Sent:** 6/26/2017 6:02:31 PM  
**To:** Rogers, Joan [rogers.joan@epa.gov]  
**Subject:** Re: Bacteria sampling holding times

Good point, I am putting together a list of areas of concern. When I talk with Chuck, I will explain the difference for holding times and listen to what he has to say about it.

Sincerely,

Cheryl

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**From:** Rogers, Joan  
**Sent:** Monday, June 26, 2017 12:14:15 PM  
**To:** Burdett, Cheryl  
**Subject:** RE: Bacteria sampling holding times

Thanks. This is helpful and it would be helpful to confirm that it changed to 6 degrees. Otherwise, we should change our FSP.

If the 9222D method is being used for "monitoring" the wells, the link I provided for that method says 24 hours is the holding time for routine monitoring. 6 hours for compliance and 6 hours is recommended for all samples.

[https://www.nemi.gov/methods/method\\_summary/5587/](https://www.nemi.gov/methods/method_summary/5587/)

I think CSD could possibly argue that their samples are routine monitoring. But because they are in the permit, we (and the state) could argue that they are compliance samples.  
Just something to think about before we characterize their sampling methods as unacceptable.

-Joan

Joan Rogers  
U.S. EPA  
77 W. Jackson Blvd  
Chicago, IL 60604  
312-886-2785  
Rogers.joan@epa.gov

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**From:** Burdett, Cheryl  
**Sent:** Monday, June 26, 2017 11:53 AM  
**To:** Rogers, Joan <rogers.joan@epa.gov>  
**Subject:** Re: Bacteria sampling holding times

I am pretty sure the 4 degrees changed to 6 degrees, but we can confirm where that has been updated in 136. Drinking water is 30 hours, but need to check to determine if they are filtering that water or why the difference between drinking water and wastewater and stream conditions is different.

Also, the wells that CSD are testing are monitoring wells as far as I am aware that would not lump them into drinking water.

Also, 9222D is the method that CSD labs are using for the monitoring wells, which is the 6 hour holding times. If you are in the office we can further discuss tomorrow.

Cheryl Burdett

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**From:** Rogers, Joan  
**Sent:** Monday, June 26, 2017 10:05:12 AM  
**To:** Burdett, Cheryl  
**Subject:** Bacteria sampling holding times

Hi CB.

In a discussion about holding times, I was questioned why we use 6 hour holding times. I just looked on our Field Sampling Plan and the test method is not listed. I want to get back to them to show that our 6 hour holding times is correct. I wanted to run it by you first to make sure that I am on the correct track.

I did some research in 40 CFR 136 for approved EPA fecal coliform methods (no chlorine)  
<https://www.law.cornell.edu/cfr/text/40/136.3>

Of the two methods (9221E and 9222D), both recommend 6 hour holding times for all samples, but the guidance docs state that 24 hours is the holding time for routine samples and 6 hours for compliance. Of course we work within the compliance world, so the 6 hour is appropriate. Here are the links to the methods:

9221E: [https://www.nemi.gov/methods/method\\_summary/5588/](https://www.nemi.gov/methods/method_summary/5588/)

9222D: [https://www.nemi.gov/methods/method\\_summary/5587/](https://www.nemi.gov/methods/method_summary/5587/)

Interestingly, it says you can have 30 hour holding times for drinking water. Also note that they say the preservation is to 4°C. Our Field Sampling Plan says 6°C. Do you think it should be changed?

Thanks.

-Joan

Joan Rogers  
U.S. EPA  
77 W. Jackson Blvd  
Chicago, IL 60604  
312-886-2785  
[Rogers.joan@epa.gov](mailto:Rogers.joan@epa.gov)